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UNITED STATES DISTRICT COURT FOR THE
Southern District OF NEW YORK

-----x Civil Action No.: 22-cv-09496

Freedom Mortgage Corporation,

Plaintiff,

**NOTICE
OF MOTION**

-against-

Marsha Jean Taggart a/k/a Marsha Jean Francis,

Defendants.

-----X

PLEASE TAKE NOTICE that, upon the annexed Declaration in Support and the Declaration of Services Rendered of Robert Tremaroli, Esq. both dated May 2, 2023, and the accompanying Bill of Cost dated May 2, 2023, and affidavit of Angela D. Roberts, sworn to on March 13, 2023, the exhibits attached thereto, and all prior proceedings in this case, Plaintiff Freedom Mortgage Corporation, by and through its attorneys Frenkel, Lambert, Weiss, Weisman & Gordon, LLP will move this court at the United States District Court for the Southern District of New York on a date, time and location to be designated by the Court and for an order granting:

1. a default judgement of foreclosure against the defendants Marsha Jean Taggart a/k/a Marsha Jean Francis in accordance with FED R. CIV. P. 55.2
2. Granting a Judgment of Foreclosure and sale;
3. Directing the distribution of the sale proceeds, and
4. Such additional relief as this court may deem just and proper

PLEASE TAKE FURTHER NOTICE that answering papers and notice of cross-motion, with supporting papers, if any, must be made in writing and received in the District Court Clerk's office, United States District Court for the Southern District of New York and by the undersigned

Frenkel, Lambert, Weiss, Weisman & Gordon, LLP, 53 Gibson Street, Bay Shore, NY 11706, and all other parties requiring notice in accordance with the rules of this Court.

Dated: May 2, 2023
Bay Shore, New York



Robert Tremaroli, Esq.
Frenkel, Lambert, Weiss, Weisman & Gordon, LLP
Attorneys for Plaintiff Freedom Mortgage Corporation
Main Office: 53 Gibson Street
Bay Shore, New York 11706
631-969-3100
Our File No.: 01-096700-F00

TO:

Marsha Jean Taggart a/k/a Marsha Jean Francis
6 Dunbar Road
Apt 5J
Monticello, NY 12701

Marsha Jean Taggart a/k/a Marsha Jean Francis
147 Haylan Road,
Yorktown Heights, NY 10598

MEMO ENDORSED

Plaintiff's motion for default is DENIED without prejudice subject to refile by way of Order to Show Cause ("OSC") for default judgment. Counsel is directed to follow ECF Rule 16.3. Plaintiff shall file a "Proposed Order to Show Cause Without Emergency Relief." The supporting documents (memorandum of law, affidavit, declaration, exhibits thereto, etc.) are separately refiled and should be linked to the proposed OSC. Counsel is directed to mail a hard copy (as well as email) to Chambers all documents in support of the OSC. Follow all directions in the OSC. Clerk of Court is requested to terminate the motion at ECF No. 20.

Dated: May 5, 2023
White Plains, NY

SO ORDERED:



HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE